

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Case No. 1:23-cv-00878-TDS-JEP**

DEMOCRACY NORTH CAROLINA; NORTH  
CAROLINA BLACK ALLIANCE; LEAGUE  
OF WOMEN VOTERS OF NORTH  
CAROLINA,

*Plaintiffs,*

v.

FRANCIS X. DE LUCA, in his official capacity  
as CHAIR OF THE STATE BOARD OF  
ELECTIONS; STACY EGGERS IV, in his  
official capacity as SECRETARY OF THE  
STATE BOARD OF ELECTIONS; ROBERT  
RUCHO, in his official capacity as MEMBER  
OF THE STATE BOARD OF ELECTIONS;  
JEFF CARMON III, in his official capacity as  
MEMBER OF THE STATE BOARD OF  
ELECTIONS; SIOBHAN O'DUFFY MILLEN,  
in her official capacity as MEMBER OF THE  
STATE BOARD OF ELECTIONS; SAM  
HAYES, in his official capacity as  
EXECUTIVE DIRECTOR OF THE STATE  
BOARD OF ELECTIONS; NORTH  
CAROLINA STATE BOARD OF  
ELECTIONS,

*Defendants,*

and

PHILIP E. BERGER, in his official capacity as  
PRESIDENT *PRO TEMPORE* OF THE  
NORTH CAROLINA SENATE; and DESTIN  
C. HALL, in his official capacity as SPEAKER  
OF THE NORTH CAROLINA HOUSE OF  
REPRESENTATIVES,

*Intervenor Defendants.*

**PLAINTIFFS' OBJECTIONS  
TO DEFENDANTS' JULY 7,  
2025, EXHIBIT LISTS**

Pursuant to the Court’s August 22, 2024, Notice (ECF No. 95), June 4, 2025, Notice to Counsel (ECF No. 139), and Federal Rule of Civil Procedure 26(a)(3), Plaintiffs respectfully submit the following objections to the State Board Defendants’ and Legislative Intervenor Defendants’ (collectively “Defendants”) July 7, 2025, Exhibit Lists. ECF No. 144-1, 145-1. Plaintiffs reserve the right to amend or modify any of the objections set forth on the basis of any stipulation entered into by the parties; any corrections and modifications to the underlying exhibits; and any orders from the Court impacting admissibility.

The following table sets forth the key for the objections found below:

<b><u>Code</u></b>	<b><u>Objection</u></b>
PROPOSED JOINT EXHIBIT	Exhibit also appears on Plaintiffs’ Exhibit List and therefore propose including it on a joint exhibit list
401	Relevance
403	Prejudice, Confusion
802	Hearsay
901	Authentication
106	Rule of Completeness
1002	Best Evidence Rule
Foundation	Foundation <sup>1</sup>
Improper/Undisclosed Expert Testimony	Exhibit includes material that is not a proper subject for lay testimony and not from a disclosed expert in this litigation
*	Plaintiffs do not contest the authenticity of these exhibits but preserve hearsay objections for any statements Defendants seek to offer for the truth of the matter asserted in those exhibits. As applicable, Plaintiffs reserve the right to admit those statements as party opponent admissions.

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<sup>1</sup> Plaintiffs’ Foundation objections will be withdrawn if foundation is properly laid at trial.

The following table sets forth Plaintiffs' objections to Defendants' July 7, 2025, Exhibit Lists:

<b><u>Exhibit No.</u></b>	<b><u>Document Title</u></b>	<b><u>Reference</u></b>	<b><u>Plaintiffs' Objections</u></b>
SBEDX0001	North Carolina Voter Registration Application	<a href="https://s3.amazonaws.com/dl.ncsbe.gov/Voter_Registration/NCVoterRegForm_06W.pdf">https://s3.amazonaws.com/dl.ncsbe.gov/Voter_Registration/NCVoterRegForm_06W.pdf</a>	
SBEDX0002	Official NCDMV: Voter Registration Application	<a href="https://www.ncdot.gov/dmv/offices-services/online/Pages/voter-registration-application.aspx">https://www.ncdot.gov/dmv/offices-services/online/Pages/voter-registration-application.aspx</a>	
SBEDX0003	N.C. State Bd. of Elections' Public Website, "Registering as a College Student"	<a href="https://www.ncsbe.gov/registering/who-can-register/registering-college-student">https://www.ncsbe.gov/registering/who-can-register/registering-college-student</a>	
SBEDX0004	Numbered Memo 2016-15	Exhibit 8 to Paul Cox Depo, NCSBE 4-7	PROPOSED JOINT EXHIBIT  <i>Appears as PX112</i>
SBEDX0005	Numbered Memo 2016-15 (rescinded)	<a href="https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2016/Numbered_Memo_2016-15_Same-Day_Registration.pdf">https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2016/Numbered_Memo_2016-15_Same-Day_Registration.pdf</a>	
SBEDX0006	Numbered Memo 2018-07	<a href="https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2018/Numbered%20Memo%202018-07.pdf">https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2018/Numbered%20Memo%202018-07.pdf</a>	
SBEDX0007	Numbered Memo 2021-03	<a href="https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2021/Numbered%20Memo%202021-03_Absentee%20Deficiencies.pdf">https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2021/Numbered%20Memo%202021-03_Absentee%20Deficiencies.pdf</a>	

SBEDX0008	Numbered Memo 2022-05	<a href="https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2022/Numbered%20Memo%202022-05_Absentee%20Voter%20Challenges%20by%20County%20Board.pdf">https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2022/Numbered%20Memo%202022-05_Absentee%20Voter%20Challenges%20by%20County%20Board.pdf</a>	
SBEDX0009	Numbered Memo 2023-04	<a href="https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2023/Numbered%20Memo%202023-04%20Provisional%20Ballots%20and%20Canvass%20Procedures.pdf">https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2023/Numbered%20Memo%202023-04%20Provisional%20Ballots%20and%20Canvass%20Procedures.pdf</a>	
SBEDX0010	Numbered Memo 2023-05	<a href="https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2023/Numbered%20Memo%202023-05%20Same-Day%20Registration.pdf">https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2023/Numbered%20Memo%202023-05%20Same-Day%20Registration.pdf</a>	PROPOSED JOINT EXHIBIT <i>Appears as PX104</i>
SBEDX0011	Numbered Memo 2023-05	Exhibit 23 to Paul Cox Depo NCSBE 2920–2932	
SBEDX0012	“Notice to Same-Day Registrants”	<a href="https://s3.us-west-1.amazonaws.com/wakegov.com.if-us-west-1/documents/2022-10/Notice%20to%20Same%20Day%20Registrants%202022.pdf">https://s3.us-west-1.amazonaws.com/wakegov.com.if-us-west-1/documents/2022-10/Notice%20to%20Same%20Day%20Registrants%202022.pdf</a>	
SBEDX0013	N.C. State Board of Elections Website “Register in Person During Early Voting”	<a href="https://www.ncsbe.gov/registering/how-register/register-person-during-early-voting">https://www.ncsbe.gov/registering/how-register/register-person-during-early-voting</a>	
SBEDX0014	SDR Work Flow Charts	Exhibit 42 to Holland Depo NCSBE 3087–3089	PROPOSED JOINT EXHIBIT <i>Appears as PX128</i>

SBEDX0015	2025-02-14 litigation_ticket_1294792 VFY_tables_2024.zip	NCSBE <del>3087</del> 3090 <sup>2</sup>	401, 403, Foundation
SBEDX0016	VH History Unlock Report.xlsx summarizing help desk tickets from previous elections	NCSBE <del>3088</del> 3091 <sup>3</sup>	401, 403, 802, 901, Foundation
SBEDX0017	Helpdesk Tickets Nov. 2024 Election	NCSBE 3092–3096	401, 403, 802, 901, Foundation
SBEDX0018	2/24/2025 Deposition of Paul Cox 30(b)(6)		Fed. R. Civ. P. 26(a)(3) (depositions may only be introduced through designation process and related deadlines)
SBEDX0019	2/25/2025 Deposition of Parker Holland 30(b)(6)		Fed. R. Civ. P. 26(a)(3) (depositions may only be introduced through designation process and related deadlines)
SBEDX0020	Email chain re SB747 language and attachments	NCSBE 653-659	
SBEDX0021	Email to Rep. Harrison about SDR	NCSBE 722-724	
SBEDX0022	Email to House Leadership	NCSBE 729–733	
SBEDX0023	SEIMS Applications, NC STEPPS	Exhibit 2 to Paul Cox Depo, NCSBE 409–412	

<sup>2</sup> Confirmed bates range correction with counsel by email dated July 10, 2025.

<sup>3</sup> Confirmed bates range correction with counsel by email dated July 10, 2025.

SBEDX0024	Voter Registration Status, NC STEPPS	Exhibit 3 to Paul Cox Depo, NCSBE 433–435	PROPOSED JOINT EXHIBIT  <i>Appears as PX108; LDTX043</i>
SBEDX0025	Field_Names_Headers_Lookup_Tables	Exhibit 4 to Paul Cox Depo, NCSBE 480 (electronic and hard copy)	PROPOSED JOINT EXHIBIT  <i>Appears as PX109; LDTX044</i>
SBEDX0026	Name: Layout_ncvoter.txt	Exhibit 5 to Paul Cox Depo, NCSBE 591–597	PROPOSED JOINT EXHIBIT  <i>Appears as PX110</i>
SBEDX0027	SDR Undeliverable Info 2024 Elections.cvs	Exhibit 6 to Paul Cox Depo, NCSBE 3097	PROPOSED JOINT EXHIBIT  <i>Appears as PX127</i>
SBEDX0028	Excerpt from election manual	Exhibit 7 to Paul Cox Depo, NCSBE 143–147	PROPOSED JOINT EXHIBIT  <i>Appears as PX111</i>
SBEDX0029	Numbered Memo 2012-20	Exhibit 9 to Paul Cox Depo, NCSBE 1–3	PROPOSED JOINT EXHIBIT  <i>Appears as PX103</i>
SBEDX0030	Data report (electronic file)	Exhibit 10 to Paul Cox Depo, NCSBE 479	PROPOSED JOINT EXHIBIT  <i>Appears as PX114</i>

SBEDX0031	Email Subject: S747	Exhibit 11 to Paul Cox Depo, NCSBE 1144–1154	PROPOSED JOINT EXHIBIT <i>Appears as PX115</i>
SBEDX0032	Email Subject: SDR process	Exhibit 13 to Paul Cox Depo, NCSBE 1351–1353	PROPOSED JOINT EXHIBIT <i>Appears as PX117</i>
SBEDX0033	Email Subject: Same day registration data pull	Exhibit 15 to Paul Cox Depo, NCSBE 1356–1359	PROPOSED JOINT EXHIBIT <i>Appears as PX119</i>
SBEDX0034	Email Subject: Elections data request	Exhibit 16 to Paul Cox Depo, NCSBE 1401–1409	401, 403, 802, Foundation
SBEDX0035	“How 1,760 ‘Ghosts’ Voted in the 2020 Election”	Exhibit 17 to Paul Cox Depo	401, 403, 802, 901, Foundation, Improper/Undisclosed Expert Testimony
SBEDX0036	Email Subject: Elections data request	Exhibit 18 to Paul Cox Depo, NCSBE 1410–1411	401, 403, 802, 106, Foundation
SBEDX0037	Email Subject: SB 747 analysis	Exhibit 20 to Paul Cox Depo, NCSBE 1547–1557	PROPOSED JOINT EXHIBIT <i>Appears as PX120</i>
SBEDX0038	SB 747 - Ratified version State Board of Elections Summary	Exhibit 21 to Paul Cox Depo, NCSBE 1819–1824	PROPOSED JOINT EXHIBIT <i>Appears as PX121</i>

SBEDX0039	Email Subject: REVISED PER COURT ORDER Numbered Memo 2023- 05 Same-Day Registration	Exhibit 22 to Paul Cox Depo, NCSBE 2903– 2904	
SBEDX0040	Email Subject: Democracy NC v Hirsch 13 23-878-TDS-JEP, Numbered Memo 2023- 05 with attachment	Exhibit 24 to Paul Cox Depo:	
SBEDX0041	Email Subject: SB 747 suggestions	Exhibit 25 to Paul Cox Depo, NCSBE 285–293	
SBEDX0042	Email Subject: Same day registration	Exhibit 26 to Paul Cox Depo, NCSBE 1265– 1268	
SBEDX0043	Email Subject: SB 747 additional fixes suggested	Exhibit 27 to Paul Cox Depo, NCSBE 363– 367	
SBEDX0044	Email Subject: SB 747	Exhibit 28 to Paul Cox Depo, NCSBE 1116– 1128	
SBEDX0045	Email Subject: REVISED PER COURT ORDER Numbered Memo 2023- 05, Same-Day 22 Registration	Exhibit 29 to Paul Cox Depo, NCSBE 481–512	PROPOSED JOINT EXHIBIT  <i>Appears as PX122; LDTX058</i>
SBEDX0046	Email Subject: Wake College Address Standards	Exhibit 30 to Paul Cox Depo, NCSBE 513–517	PROPOSED JOINT EXHIBIT  <i>Appears as PX123; LDTX059</i>



SBEDX0047	Email Subject: Thank you	Exhibit 31 to Paul Cox Depo, NCSBE 25–51	PROPOSED JOINT EXHIBIT  <i>Appears as PX201; LDTX060</i>
SBEDX0048	New Voter Verification Cycle diagram.	Exhibit 32 to Paul Cox Depo	401, 403, 802, 901, Foundation
SBEDX0049	Processing Undeliverable Same Day Registration Voter Registration Cards Job Aid	Exhibit 33 to Holland Depo, NCSBE 2945–2949	PROPOSED JOINT EXHIBIT  <i>Appears as PX124; LDTX091</i>
SBEDX0050	Email Subject: Notice to Same Day Registrants	Exhibit 34 to Holland Depo, NCSBE 2890–2894	
SBEDX0051	Notice to Verify Your Address	Exhibit 35 to Holland Depo, NCSBE 19–20	
SBEDX0052	Email Subject: Chowan elections director cautions voters about new voter ID rules	Exhibit 36 to Holland Depo, NCSBE 1447	
SBEDX0053	Email Subject: Undeliverable SDR's	Exhibit 37 to Holland Depo, NCSBE 3071–3073	
SBEDX0054	Email Subject: Date to stop the SDR denial process	Exhibit 38 to Holland Depo, NCSBE 2935	
SBEDX0055	Email Subject: Chowan elections director cautions voters about new voter ID rules	Exhibit 39 to Holland Depo, NCSBE 1447–1452	

SBEDX0056	North Carolina STEPPS	Exhibit 40 to Holland Depo, NCSBE 415–417	PROPOSED JOINT EXHIBIT  <i>Appears as PX125; LDTX097</i>
SBEDX0057	Slip sheet 2025-02-06 litigationticket_124972_S DRundeliverable_ verification_history_2024 (electronic file)	Exhibit 41 to Holland Depo, NCSBE 003098	PROPOSED JOINT EXHIBIT  <i>Appears as PX126; LDTX097</i>
SBEDX0058	Screenshot of data received from NCSBOE, February 3, 2025 (eight files)	Exhibit 43 to Holland Depo	
SBEDX0059	Summary document printed from txt files	Exhibit 44 to Holland Depo	401, 403, 901, Foundation, 106
SBEDX0060	Assigned values and reason codes	Exhibit 45 to Holland Depo:	401, 403, 901, Foundation, 106
LDTX001	S.B. 747/SL 2023-140 Bill Lookup	<a href="https://www.ncleg.gov/BillLookup/2023/S747">https://www.ncleg.gov/BillLookup/2023/S747</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX015</i>
LDTX002	S.B. 747/SL 2023-140 Bill Text	Daniel 41; <a href="https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S747v6.pdf">https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S747v6.pdf</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX007</i>
LDTX003	Rep. Longest Amendment A12 (S747-ACH-38 v.2)	<a href="https://webservices.ncleg.gov/ViewBillDocument/2023/7087/0/S747-ACH-38-V-2">https://webservices.ncleg.gov/ViewBillDocument/2023/7087/0/S747-ACH-38-V-2</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX048</i>

LDTX004	Rep. Buansai Amendment A4 (S747-AST-135 v.2)	Mills 87; <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/7103/0/S747-AST-135-V-2">https://webservices.ncleg.gov/ViewBillDocument/2023/7103/0/S747-AST-135-V-2</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX014; PX040</i>
LDTX005	Proposed House Committee Substitute (06.05.2023) (S747 PCS45363-BK-37)	Daniel 38; <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/6966/0/S747-PCS45363-BK-37">https://webservices.ncleg.gov/ViewBillDocument/2023/6966/0/S747-PCS45363-BK-37</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX006</i>
LDTX006	S747 Bill Summary (PCS to Third Edition S747-CSBK-37)	<a href="https://webservices.ncleg.gov/ViewDocSiteFile/80939">https://webservices.ncleg.gov/ViewDocSiteFile/80939</a>	
LDTX007	S747-CSBK-37 v.9 Proposed Committee Substitute	<a href="https://webservices.ncleg.gov/ViewDocSiteFile/80934">https://webservices.ncleg.gov/ViewDocSiteFile/80934</a>	
LDTX008	Rep. Mills Unnumbered Amendment (S747-ABK-66 v.3)	<a href="https://webservices.ncleg.gov/ViewDocSiteFile/80962">https://webservices.ncleg.gov/ViewDocSiteFile/80962</a>	
LDTX009	Rep. Buansi Unnumbered Amendment (S747-ACH-22 v.3)	<a href="https://webservices.ncleg.gov/ViewDocSiteFile/80967">https://webservices.ncleg.gov/ViewDocSiteFile/80967</a>	
LDTX010	Senator Marcus Amendment A10 (S747-ABK-46 v.6)	Daniel 29; <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/6417/0/S747-ABK-46-V-6">https://webservices.ncleg.gov/ViewBillDocument/2023/6417/0/S747-ABK-46-V-6</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX005; PX031</i>
LDTX011	Senator Mayfield Amendment A3 (S747-AST-93 v.3)	<a href="https://webservices.ncleg.gov/ViewBillDocument/2023/6408/0/S747-AST-93-V-3">https://webservices.ncleg.gov/ViewBillDocument/2023/6408/0/S747-AST-93-V-3</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX024</i>

LDTX012	Senator Mohammed Amendment A2 (S747-ATE-3 v.5)	<a href="https://webservices.ncleg.gov/ViewBillDocument/2023/6406/0/S747-ATE-3-V-5">https://webservices.ncleg.gov/ViewBillDocument/2023/6406/0/S747-ATE-3-V-5</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX023</i>
LDTX013	SB 747 Redistricting and Elections Committee Substitute Adopted 6/15/23, Third Edition engrossed 6/21/23	Mills 70; <a href="https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S747v3.pdf">https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S747v3.pdf</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX013; PX032</i>
LDTX014	S747-ABK-40 v.6	Daniel 25; <a href="https://webservices.ncleg.gov/ViewDocSiteFile/80135">https://webservices.ncleg.gov/ViewDocSiteFile/80135</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX004</i>
LDTX015	S747-AST-82 v.2	<a href="https://webservices.ncleg.gov/ViewDocSiteFile/80137">https://webservices.ncleg.gov/ViewDocSiteFile/80137</a>	
LDTX016	S747-CSBK-30 v.15 Proposed Committee Substitute	Daniel 21; <a href="https://webservices.ncleg.gov/ViewDocSiteFile/80126">https://webservices.ncleg.gov/ViewDocSiteFile/80126</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX003</i>
LDTX017	S747-SMBK-56(CSBK-30) v.4 Proposed Committee Substitute	<a href="https://webservices.ncleg.gov/ViewDocSiteFile/80127">https://webservices.ncleg.gov/ViewDocSiteFile/80127</a>	
LDTX018	S747 Election Law Changes (Draft Bill Text)	<a href="https://webservices.ncleg.gov/ViewDocSiteFile/80125">https://webservices.ncleg.gov/ViewDocSiteFile/80125</a>	
LDTX019	S747 PCS35291-BK-31	<a href="https://webservices.ncleg.gov/ViewBillDocument/2023/6249/0/S747-PCS35291-BK-31">https://webservices.ncleg.gov/ViewBillDocument/2023/6249/0/S747-PCS35291-BK-31</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX019</i>

LDTX020	S.B. 747 DRS5341-LU-143	Daniel 14; <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/5959/0/DRS45341-LU-143">https://webservices.ncleg.gov/ViewBillDocument/2023/5959/0/DRS45341-LU-143</a>	PROPOSED JOINT EXHIBIT  <i>Appears as PX002</i>
LDTX021	06.14.2023 0100PM LOB 544 Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX060</i>
LDTX022	06.15.2023 0930am LOB 544 Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX061</i>
LDTX023	06.20.2023 0100pm 1027 1128 LB Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX062</i>
LDTX024	06.21.2023 Afternoon Senate Session Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX063</i>
LDTX025	06.22.2023 0130PM Auditorium LB Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX064</i>
LDTX026	08.15.2023 0230PM 1228 1327 LB Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX065</i>

LDTX027	08.16.2023 1215PM Auditorium LB Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX067</i>
LDTX028	08.16.2023 Senate Session Audio File		PROPOSED JOINT EXHIBIT*  <i>Appears as PX066</i>
LDTX029	"About Us" from the website for the North Carolina Black Alliance	Bass 3; NCBA_0000035–43	PROPOSED JOINT EXHIBIT  <i>Appears as PX144</i>
LDTX030	"North Carolina Black Alliance 2024 Organization Overview" by North Carolina Black Alliance	Bass 4; NCBA_0000676–682	
LDTX031	"NC Voter Registration Form Checklist" by North Carolina Black Alliance	Bass 5; NCBA_0001962–1972	PROPOSED JOINT EXHIBIT  <i>Appears as PX140</i>
LDTX032	"Early Voting Site Report" by North Carolina Black Alliance	Bass 6; NCBA_0002092–2099	PROPOSED JOINT EXHIBIT  <i>Appears as PX141</i>
LDTX033	"About Us" by Democracy NC	Carter 3; DemNC_0004880–4882	

LDTX034	"Get Out the Vote Activities for the 2022 Election"	Carter 4; DemNC_0007350–7358	
LDTX035	Spreadsheet with voter turnout analysis for supporters of Democracy NC, 2016-2020	Carter 5; DemNC_0007368	802, Foundation, 401, 403, 901, 106
LDTX036	"2020 Voter Turnout Report" by Democracy NC	Carter 6; DemNC_0000469–482	
LDTX037	Screenshot of Facebook post by Democracy NC 08.16.2024	Carter 7; DemNC_0006273	
LDTX038	Agenda for "Meeting with North Carolina Association of Election Administrators"	Carter 8; DemNC_0005560–5562	401, 403, 901, 802, Foundation, 1002
LDTX039	Cheryl Carter Email Draft Re: HB 485	Carter 9; DemNC_0005539	
LDTX040	Screenshot of Facebook post by Democracy NC 08.14.2024	Carter 10; DemNC_0006308	
LDTX041	Article "One Week Away from Election Day, Most States Are Behind 2020 in Youth Voter Registration" by Katie Hilton and Sam Searles	Carter 11	802, 901, Foundation, 401, 403

LDTX042	"SEIMS Applications" page from NCSBE website	Cox 2; NCSBE_0000409–412	
LDTX043	"Voter Registration Status" page from NCSBE website	Cox 3; NCSBE_0000433–435	PROPOSED JOINT EXHIBIT  <i>Appears as PX108; SBEDX0024</i>
LDTX044	"Fi525eld Names Headers Lookup Tables”	Cox 4; NCSBE_0000480	PROPOSED JOINT EXHIBIT  <i>Appears as PX109; SBEDX0025</i>
LDTX045	NC Voter File layout.txt	Cox 5; NCSBE_0000591–597	PROPOSED JOINT EXHIBIT  <i>Appears as PX110; SBEDX0026</i>
LDTX046	Undeliverable Info 2024 NCSBE Spreadsheet	Cox 6; NCSBE_3097	PROPOSED JOINT EXHIBIT  <i>Appears as PX127; SBEDX0027</i>
LDTX047	Numbered Memo 2016-15	Cox 8; NCSBE_00004-7	PROPOSED JOINT EXHIBIT  <i>Appears as PX112; SBEDX0004</i>



LDTX048	Numbered Memo 2012-20	Cox 9; NCSBE_00001-3	PROPOSED JOINT EXHIBIT  <i>Appears as PX103; SBEDX0029</i>
LDTX049	Excel spreadsheet NCSBE NC Same-Day Registration Statistics for the 2016, 2018, 2020, and 2022 General Elections	Cox 10; NCSBE_0000479	PROPOSED JOINT EXHIBIT  <i>Appears as PX114; SBEDX0030</i>
LDTX050	Email exchange between Paul Cox and legislative staff providing feedback on SB 747	Cox 12; NCSBE_001343-1345	PROPOSED JOINT EXHIBIT  <i>Appears as PX116</i>
LDTX051	Email exchange between Paul Cox and attaching spreadsheet based on Cox's data request	Cox 15; NCSBE_001356-1359	PROPOSED JOINT EXHIBIT  <i>Appears as PX119; SBEDX0033</i>
LDTX052	"Elections & Public Integrity: How 1,760 'Ghosts' Voted in the 2020 Election" by Andy Jackson	Cox 17	401, 403, 802, 901, Foundation, Improper/Undisclosed Expert Testimony
LDTX053	NCSBE Summary of ratified version of SB 747	Cox 21; NCSBE_001819-1824	PROPOSED JOINT EXHIBIT  <i>Appears as PX121; SBEDX0038</i>

LDTX054	Email correspondence from Paul Cox to Sen Dan Blue's office regarding NCSBE latest recommendations on SB 747	Cox 25; NCSBE_Public Records_0000285-293	PROPOSED JOINT EXHIBIT  <i>Appears as PX199</i>
LDTX055	Email from Paul Cox to Pricey Harrison responding to Harrison's inquiry about SB 747	Cox 26; NCSBE_Public Records_0001265-1268	
LDTX056	Email from Paul Cox to Rep. Mills' office providing additional suggested changes to SB 747	Cox 27; NCSBE_Public Records_0000363-367	
LDTX057	Email from Paul Cox to Reps. Harrison, Dahle, and Buansi providing NCSBE suggested revisions to SB 747	Cox 28; NCSBE_Public Records_0001116-1128	PROPOSED JOINT EXHIBIT  <i>Appears as PX200</i>
LDTX058	Email from Paul Cox to County Directors sharing revised 01.29.2024 version of Numbered Memo 2023-05	Cox 29; NCSBE_0000481-512	PROPOSED JOINT EXHIBIT  <i>Appears as PX122; SBEDX0045</i>
LDTX059	Email from Olivia McCall to Paul Cox re: Wake County college address standards	Cox 30; NCSBE_0000513-517	PROPOSED JOINT EXHIBIT  <i>Appears as PX123; SBEDX0046</i>

LDTX060	Email from Lindsey Wakely to Joe Coletti providing feedback on questions and SDR analysis	Cox 31; NCSBE_Public Records_0000025-51	401, 403, 802, Foundation
LDTX061	"New Voter Verification Cycle" flow chart	Cox 32	401, 403, 802, 901, Foundation
LDTX062	"Bamboozling the Lawmakers" by Voter Integrity Project	Daniel 3	401, 403, 802, 901, Foundation, Improper/Undisclosed Expert Testimony
LDTX063	Email from Lindsey Wakely to Rep. Buansi providing NCSBE analysis of SB747	Daniel 4; NCSBE_0000604-614	
LDTX064	Email from Joanne Empie to Andy Perrigo sharing NCEIT 2022 Post Election Analysis	Daniel 5; LEG_DEFS_0000539-580	PROPOSED JOINT EXHIBIT <i>Appears as PX073</i>
LDTX065	Email from Paul Cox to Joe Coletti discussing data relating to list created by Andy Jackson	Daniel 6	901, 802, Foundation, 401, 403
LDTX066	Email from Jim Womack to Rep. Mills providing NCEIT Legislative Priorities for 2023-2024	Daniel 7; LEG_DEFS_0002129, 2132-2133	PROPOSED JOINT EXHIBIT <i>Appears as PX074</i>

LDTX067	Email from John Lock Foundation to Rep. Mills' office re: draft legislation from Dr. Andy Jackson	Daniel 8; LEG_DEFS_0000197-200	802, 901, Foundation
LDTX068	Email from Sen Daniel's office to Dave Goetze	Daniel 9; LEG_DEFS_0004927-4928; 0006718-6788	PROPOSED JOINT EXHIBIT <i>Appears as PX075</i>
LDTX069	Election Statute Presentation from NCEIT	Daniel 11; NCEIT000008-31	PROPOSED JOINT EXHIBIT <i>Appears as PX192</i>
LDTX070	Email correspondence from Jim Womack to Brent Woodcox re: round table on election law	Daniel 12; LEG_DEFS_0006694-6695	PROPOSED JOINT EXHIBIT <i>Appears as PX077</i>
LDTX071	"Senate Republicans Reintroduce Election Integrity Legislation" Press Release	Daniel 15; LEG_DEFS_0004319-4321	PROPOSED JOINT EXHIBIT <i>Appears as PX078</i>
LDTX072	Email from Paul Cox to Kristen Guillory sending updated analysis of SB 747	Daniel 16; NCSBE_Public Records_0000073-85	
LDTX073	Email from Paul Cox to Yost and Woodcox providing suggested revisions to SB 747	Daniel 18; NCSBE_0000633-637	

LDTX074	Email from Mary Summa to Senate leadership expressing concerns with SB 747	Daniel 19; LEG_DEFS_0004239-4340	PROPOSED JOINT EXHIBIT  <i>Appears as PX080</i>
LDTX075	Email from Paul Cox to Yost and Woodcox providing suggested revisions to SB 747 PCS	Daniel 26; NCSBE_0000653-659	
LDTX076	NCSBE Presentation to the House Oversight and Reform Committee	Daniel 31; LEG_DEFS_0006344-6363	PROPOSED JOINT EXHIBIT  <i>Appears as PX083 – starts at LEG_DEFS_0006343</i>
LDTX077	Email from Paul Cox to Rep. Mills, Hayes, and Barefoot re: NCSBE revisions to SB 747	Daniel 32; NCSBE_Public Records_0000363-367	
LDTX078	Email from Paul Cox to Yost and Woodcox sharing feedback on SB 747 provided to the House	Daniel 37; NCSBE_0000791-802	
LDTX079	Email from Tim Tsujii to Allison Blackman re: cure efforts	Tsujii 2; DEM NC_INT0010829	
LDTX080	Email from Kay Moore to Allison Blackman re: processing pending SDRs	Tsujii 3; DEM NC_INT0010829	PROPOSED JOINT EXHIBIT  <i>Appears as PX202</i>
LDTX081	"SSM Job Aid" from NCSBE	Tsujii 7	

LDTX082	Forsyth County BOE "Student Election Guide"	Tsujii 8; DEM NC_INT0010834	PROPOSED JOINT EXHIBIT  <i>Appears as PX203</i>
LDTX083	Guidance for College Addresses for use with Same Day Registration for Colleges and Universities	Tsujii 9	PROPOSED JOINT EXHIBIT  <i>Appears as PX204</i>
LDTX084	Forsyth County BOE College Student Voting & Registration Reference Document	Tsujii 10; County Board PRR_0000368-370	PROPOSED JOINT EXHIBIT  <i>Appears as PX205</i>
LDTX085	Forsyth BOE Tracker Chart – SDR Cures	Moore 11	PROPOSED JOINT EXHIBIT  <i>Appears as PX206</i>
LDTX086	"No Participation without Representation: The Impact of Descriptive and Substantive Representation on the Age-Related Turnout Gap" by Angelucci, Carrieiri, and Improta	Grumbach 7	802, Foundation, 401, 403, 901
LDTX087	"Overall Youth Turnout Down From 2020 but Strong in Battleground States"	Grumbach 11	802, Foundation, 401, 403, 901

LDTX088	"Young People and the 2024 Election: Struggling, Disconnected, and Dissatisfied" by Medina, Seigel-Stechler, and Suzuki	Grumbach 13	802, Foundation, 401, 403, 901
LDTX089	CIRCLE Post-2024 Election Youth Poll Results	Grumbach 14	802, Foundation, 401, 403, 901
LDTX090	"How Election Rules Affect Who Wins" by Grimmer and Hersh	Grumbach 16	802, Foundation, 401, 403, 901
LDTX091	"Processing Undeliverable Same Day Registration Voter Registration Cards" by NCSBE	Holland 33; NCSBE_002945-2949	PROPOSED JOINT EXHIBIT  <i>Appears as PX124</i>
LDTX092	Email from Adam Steel to Parker Holland re: updates to Notice to Same Day Registrants	Holland 34; NCSBE_002890-2894	
LDTX093	Form Document - Notice to Verify Your Address	Holland 35; NCSBE_000019-20	
LDTX094	Email from Parker Holland to Paul Cox re: notices to counties	Holland 37; NCSBE_003071-3073	
LDTX095	Email from James Lell to Paul Cox re: changing cutoff date from numbered memo	Holland 38; NCSBE_002935	

LDTX096	NCSBE "Mail Verification - New Voter Mailing Process"	Holland 40; NCSBE_0000415-417	PROPOSED JOINT EXHIBIT  <i>Appears as PX125</i>
LDTX097	Undeliverable Verification History 2024 Spreadsheet from NCSBE	Holland 41; NCSBE_003098	PROPOSED JOINT EXHIBIT  <i>Appears as PX126</i>
LDTX098	2024 SDR Processing Flow Charts	Holland 42; NCSBE_003087-3089	PROPOSED JOINT EXHIBIT  <i>Appears as PX128; SBEDX0014</i>
LDTX099	Screenshot of NCSBE Data Production Folder 02.01.2025	Holland 43	
LDTX100	Examples from NCSBE_003098	Holland 44	401, 403, 901, Foundation, 106
LDTX101	Field Names & Assigned Values	Holland 45	401, 403, 901, Foundation, 106
LDTX102	"Processing Undeliverable Same Day Registration Voter Registration Cards" from NCSBE	Hunter Havens 2; NCSBE_0000586-587	
LDTX103	League of Women Voters of NC Public Policy Positions	Rubin 5; LWVNC_0001271-1280	PROPOSED JOINT EXHIBIT  <i>Appears as PX170</i>



LDTX104	League of Women Voters "Statement on Election Law Changes for NC House Committee on Oversight and Reform"	Rubin 6; LWVNC_0000701-705	
LDTX105	Vote411.org Screenshot "North Carolina Voting Information"	Rubin 7	106, 901
LDTX106	Email from Paul Cox to Joe Coletti and Sumit Gupta re: data and info requests	NCSBE_0000668-677 (full bates range for Mills 53)	802, Foundation, 401, 403, 901
LDTX107	Email from cls28655 to NCGA members requesting repeal of SDR	Mills 58; LEG_DEFS_0003964-66	802, Foundation, 901
LDTX108	Email correspondence from Jordan Roberts to Mason Barefoot following up on meeting discussing research from Dr. Andy Jackson	Mills 62; LEG_DEFS_0002660	PROPOSED JOINT EXHIBIT  <i>Appears as PX090</i>
LDTX109	Email from Carol Snow to Darryl Black following up re: election integrity issues	Mills 66; LEG_DEFS_0003165-3166	401, 403, 802, Foundation, 901
LDTX110	Email from Joe Coletti to Andy Jackson re: testimony for the House Oversight and Reform Committee	Mills 68; LEG_DEFS_0006300-6302	901, 802, Foundation, 401, 403

LDTX111	Email from Joe Coletti and Paul Cox discussing NCSBE responses to data cited by Andy Jackson	Mills 69; NCSBE_0000678-679	901, 802, Foundation, 401, 403, 106
LDTX112	Email from Paul Cox to Rep. Harrison re: SDR provision of SB 747	Mills 71; NCSBE_0000722-23	
LDTX113	Transcript of House Oversight and Reform Committee	Mills 72	802
LDTX114	Email from Paul Cox to Rep. Mills, Hayes, and Barefoot re: additional suggestions for revisions to SB 747	Mills 76; NCSBE_0000729-733	
LDTX115	"Improving Trust in Elections" Article	Mills 77	802, 401, Foundation, 901
LDTX116	Email from Mason Barefoot to admin group forwarding suggestions from NCSBE	Mills 78; LEG_DEFS_0002215-2219	
LDTX117	Email from Paul Cox to Drum, Hayes, and Churchill re: feedback on House PCS 081333	Mills 83; NCSBE_0000778-790	PROPOSED JOINT EXHIBIT <i>Appears as PX130</i>
LDTX118	Email from Paul Cox to Rep. Harrison re: poll observer suggestions and addressing deadline for printed ballots	Mills 84; NCSBE_0000816-818	

LDTX119	Declaration of Non-Party Cleta Mitchell	Mitchell 93	802
LDTX120	Presentation "Election Statute Presentation for Senate Election & Redistricting Committee Co-Chairs" by NCEIT	Mitchell 98; NCEIT000008-31	PROPOSED JOINT EXHIBIT  <i>Appears as PX198</i>
LDTX121	"Who Can Register" NCSBE Website Screenshot	Mitchell 99	
LDTX122	North Carolina Voter Registration Application	Mitchell 100	
LDTX123	"Register in Person During Early Voting" NCSBE Website Screenshot	Mitchell 101	

LDTX124	"North Carolina Voter Registration List Maintenance" by NCSBE	Quinn 2; NCSBE_0000340-374	PROPOSED JOINT EXHIBIT  <i>Appears as PX129</i>
LDTX125	Expert Report of Dr. Andrew Taylor (03.05.2025)	Taylor 1	802 (Objection will be withdrawn if expert testifies at trial, pursuant to the parties' agreement)
LDTX126	Appendix A CV of Dr. Andrew Taylor	Taylor 2	802 (Objection will be withdrawn if expert testifies at trial, pursuant to the parties' agreement)
LDTX127	"2022 Voter Friendly Campus Report" by Voter Friendly Campus	Taylor 7	802, Foundation, 401, 403, 901
LDTX128	Expert Report of Dr. Paul F. White (03.05.2025)	White 1; Quinn 5	802 (Objection will be withdrawn if expert testifies at trial, pursuant to the parties' agreement)

LDTX129	Rebuttal Expert Report of Dr. Paul F. White (03.26.2025)	White 2; Quinn 4	802 (Objection will be withdrawn if expert testifies at trial, pursuant to the parties' agreement)
LDTX130	NCBA 2023 SB 747 Talking Points	NCBA_0002125-2127	Foundation, 802

Dated: July 18, 2025

Respectfully Submitted,

/s/ Jeffrey Loperfido

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all parties of record.

/s/ Jeffrey Loperfido

Jeffrey Loperfido (State Bar #52939)